

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
LightSquared Technical Working)	IB Docket No. 11-109
Group Report)	
)	
and)	
)	
LightSquared Subsidiary LLC Request for)	File No. SAT-MOD-20101118-00239
Modification of its Authority for an Ancillary)	
Terrestrial Component)	

COMMENTS OF NET TALK.COM, INC.

Net Talk.com, Inc. (“Net Talk”) hereby submits these comments in response to the Commission’s request for comments on the Technical Working Group Report (“TWG Report”).¹ LightSquared’s proposed 4G LTE will facilitate competition for broadband services by allowing companies like Net Talk to develop their own branded advanced communications services. Given the urgent need for increased competition in the market for broadband services, Net Talk urges the Commission to address all outstanding issues in a manner that allows LightSquared to move forward with the deployment of its network expeditiously.

Net Talk is a telecommunications and consumer electronics company offering a variety of innovative, easy-to-use products designed to help consumers save money on phone calls and more. The company provides commercial and residential telecommunication services, including services utilizing voice over internet protocol (“VoIP”) technology, session initiation protocol (“SIP”) technology, wireless fidelity technology, wireless maximum technology, marine satellite services technology and other similar technologies.

Our main products are the TK 6000 and the DUO, analog telephone adapters that connect analog telephones and faxes to home, home office, or corporate local area networks. Our TK 6000 and DUO and their related services offer a cost-effective solution for individuals, small businesses

¹ Public Notice, *Comment Deadline Established Regarding LightSquared Technical Working Group Report*, DA 11-1133, IB Docket No. 11-109 (June 30, 2011).

and telecommuters to connect to any analog telephone, fax or private branch exchange (“PBX”). In addition, analog telephones attached to our TK 6000 and DUO are able to use advanced calling features such as call forwarding, caller ID, 3-way calling, call holding, call retrieval and call transfer. Net Talk’s DUO, which is the smallest VoIP analog telephone adapter in the world, is a *Laptop Magazine* Editor’s Choice,² and was designated “Business Ready” by *PCWorld*.³

Net Talk’s services are delivered via Internet Protocol (“IP”) and similar technologies, and therefore, are dependent on a customer’s access to a broadband Internet connection. Under the current market structure whereby broadband services are provided by large incumbent operators, customers who purchase one of Net Talk’s products must rely upon a separate company for broadband connectivity.

LightSquared’s proposed 4G LTE network will facilitate competition in the market for broadband services by allowing companies like Net Talk to supply the underlying broadband connection for its own products and services. As a wholesale customer on LightSquared’s network, Net Talk will be able to develop its own branded voice and high-speed mobile data services, and thereby deliver the most advanced communications services to its growing customer base. Moreover, with LightSquared wholesale-only business model, Net Talk will be able to deploy our own devices, applications and services at a competitive cost and without retail competition from LightSquared.

Net Talk understands that some commenters have expressed concern that LightSquared’s terrestrial signal will affect GPS devices and that the FCC will not allow LightSquared to proceed commercially under its waiver until the FCC concludes that any GPS interference issues have been resolved. Net Talk understands, however, that LightSquared’s recent proposal addresses all

² See *PC Magazine*, netTALK DUO Review (Jun. 29, 2011) available at <http://www.pcmag.com/article2/0,2817,2387769,00.asp> (last viewed July 27, 2011).

³ See *PCWorld*, netTalk DUO Review (Sept. 20, 2010), available at http://www.pcworld.com/product/666919/nettalk_duo.html (last viewed July 27, 2011).

outstanding issues in a manner that minimizes interference while also allowing LightSquared to proceed with initial deployment of its network.⁴

The Commission should ensure that its application and approval processes are not being used in an anti-competitive manner to prevent the deployment of competitive services and networks. On this issue, Net Talk notes that the current limitations in the GPS receivers effectively prevent the use of valuable spectrum in adjacent frequencies. Moreover, Net Talk understands that the GPS industry has been on notice concerning LightSquared's proposed network for several years, and that the interference issues of which the GPS industry now complains could have been resolved in a cost-effective manner at a much earlier stage in LightSquared's deployment process.

LightSquared's proposed network is a significant step forward in facilitating competition in the market for wireless broadband services. LightSquared's proposed network offers a reliable and cost-effective alternative to the incumbent operators which have dominated the market for several years. Now, however, with LightSquared's 4G LTE network, customers have the opportunity to access service providers like Net Talk who are committed to providing the most innovative and advanced services at competitive prices. Net Talk's urges the Commission to permit LightSquared to move forward with its terrestrial network without further delay.

Respectfully submitted,

By: /s/ Anastasios N. Kyriakides

Anastasios N. Kyriakides
President and CEO
Net Talk.com, Inc.
1200 NW 163rd Drive, Ste. B-4
North Miami Beach, FL 33169
(305) 621-1200 Tel
(205) 621-1201 Fax

Audrey Glenn
Counsel to Net Talk.com, Inc.
1629 K Street, NW, Ste. 300
Washington, DC 20006

⁴ See Letter from Henry Goldberg, Counsel for LightSquared Subsidiary LLC, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 11-109 (June 30, 2011).

(202) 905-0487 Tel
(202) 449-1388 Fax